

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCTS LIABILITY LITIGATION)	Master Docket No.: 2:18-mn-2873-RMG
--	---	--

CITY OF CAMDEN, et al.,)	Civil Action No.: 2:23-cv-03230-RMG
<i>Plaintiffs,</i>))
-vs-))
E.I. DUPONT DE NEMOURS AND COMPANY (n/k/a EIDP, Inc.), et al.))
<i>Defendants.</i>))

**UNOPPOSED MOTION FOR EXTENSION OF TIME
FOR THE NOTICE ADMINISTRATOR TO PROVIDE HIS REPORT
IN THE PRELIMINARILY APPROVED CLASS SETTLEMENT**

Class Counsel move for an extension of time for an additional one (1) day, until December 13, 2023, for the Notice Administrator to provide its opt out and objections report in the preliminarily approved Class Settlement between the Parties. Class Counsel has conferred with counsel for defendants The Chemours Company, The Chemours Company FC, LLC, DuPont de Nemours, Inc., Corteva, Inc., and E.I. DuPont de Nemours and Company (n/k/a/ EIDP, Inc.) (the “DuPont Entities”) who do not oppose this motion.

Class Counsel and the Dupont Entities jointly moved for an extension of time for Angeion to file its report (ECF No. 4180). Such request was granted by Court order which allowed for a 6-day extension of time, up to December 12, 2023 (ECF No. 4182). Class Counsel now move for an additional extension of one (1) day, to December 13, 2023, to allow Angeion to complete the report.

Wherefore, Class Counsel request that a 1-day extension of time, up to and including December 13, 2023, be allowed for the submission of the Notice Administrator’s report.

Dated: December 12, 2023

Respectfully Submitted,

s/ Michael A. London
Michael A. London
Douglas and London P.C. 59
Maiden Lane, 6th Floor
New York, NY 10038
212-566-7500
212-566-7501 (fax)
mlondon@douglasandlondon.com

s/ Paul J. Napoli
Paul J. Napoli
Napoli Shkolnik
1302 Avenida Ponce de León
San Juan, Puerto Rico 00907
Tel: (833) 271-4502
Fax: (646) 843-7603
pnapoli@nsprlaw.com

s/ Scott Summy
Scott Summy
Baron & Budd, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219
214-521-3605
ssummy@baronbudd.com

s/ Elizabeth A. Fegan
Elizabeth A. Fegan
Fegan Scott LLC
150 S. Wacker Dr., 24th Floor
Chicago, IL 60606
312-741-1019
beth@feganscott.com

s/ Joseph F. Rice
Joseph F. Rice
Motley Rice
28 Bridgesside Blvd.
Mount Pleasant, SC 29464
jrice@motleyrice.com

Class Counsel

/s/ David Brenton Dwerkotte

David Brenton Dwerkotte
Shook, Hardy & Bacon L.L.P.
2555 Grand Boulevard
Kansas City, Missouri 64108-2613
Phone: (816) 474-6550
Facsimile: (816) 421-5547
Dbdwerkotte@shb.com

*Counsel for The Chemours Company and The
Chemours Company FC, LLC, DuPont de
Nemours, Inc., Corteva, Inc., and E.I. DuPont de
Nemours and Company n/k/a EIDP, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 12th day of December 2023 and was thus served electronically upon counsel of record.

/s/ Michael A. London
Michael A. London
Douglas and London PC
59 Maiden Lane, 6th Floor
New York, NY 10038
212-566-7500
212-566-7501 (fax)
mlondon@douglasandlondon.com